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April 29, 2021

BY ECF

Honorable Alvin K. Hellerstein
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

The extension is granted. The May 21, 2021 conference is hereby adjourned until July 2, 2021 at 10 am.
So ordered,
/s/ Alvin K. Hellerstein
Alvin K. Hellerstein
4/30/21

Re: Jabbar Richardson v. City of New York, et al., 21-CV-00622 (AKH)

Your Honor:

I am an Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, and the attorney representing Defendant City of New York in the above-referenced matter. I write respectfully to request that the Court grant Defendant City a second extension of time to respond to the Complaint by 30 days, from May 2, 2021 to June 2, 2021. Defendant City also seeks a corresponding adjournment of the initial conference currently scheduled for May 21, 2021. This request is submitted with consent of the plaintiff.

By way of background, plaintiff alleges, *inter alia*, that, on October 27, 2019, he was unlawfully searched and arrested by unknown New York City Police Department officers. On March 8, 2021, the Court granted Defendant City's first request for an extension of time to answer the complaint. (See ECF Nos. 11-12.) Defendant City makes the instant second extension request so that it may have time to collect records which were previously sealed pursuant to NY CPL 160.50. Unfortunately, New York City Police Department representatives who assist in gathering documents remain limited in their capacities due to COVID-19 restrictions and limitations that continue to cause delays. Moreover, Defendant City requires additional time so that it may contribute to the initial conference in a more meaningful way. Specifically, after receipt and review of unsealed records, our office seeks more time so that we may attempt to interview the John Doe officers plaintiff purports to name in the complaint to gather pertinent information.

For the reasons set forth above, Defendant City respectfully requests that the Court: (1) extend its time to Answer to the Complaint until June 2, 2021, and (2) adjourn the date of the initial conference to a date after submission of the City's Answer.

Thank you for your consideration of this application.

Respectfully submitted,

s/ *Amanda M. Rolon*
Assistant Corporation Counsel
Special Federal Litigation Division

cc: **BY ECF**
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